

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

R. DAVID WOLFE, on behalf of himself and  
all others similarly situated,

Plaintiff,

v.

MORRY WEISS, ZEV WEISS, JEFFREY  
WEISS, ELIE WEISS, GARY WEISS, JUDITH  
WEISS, IRVING I. STONE OVERSIGHT  
TRUST, IRVING STONE LIMITED  
LIABILITY COMPANY, IRVING I. STONE  
SUPPORT FOUNDATION, IRVING I. STONE  
FOUNDATION, and AMERICAN  
GREETINGS CORPORATION,

Defendants.

Case No. 1:12-cv-02776-JG

**JUDGE JAMES S. GWIN**

**MOTION FOR ADMISSION *PRO*  
*HAC VICE* OF J. DANIEL ALBERT**

NOW COMES the Plaintiff, by and through his counsel, Joel Levin of Levin & Associates Co., L.P.A., and respectfully requests an Order, pursuant to Local Civ. R. 83.5(h), be entered permitting attorney J. Daniel Albert to appear *pro hac vice* in the pending matter. In support of the motion, Plaintiff states as follows:

1. Mr. Albert is an active member in good standing of the Bar of the Commonwealth of Pennsylvania, without any restriction on his eligibility to practice. Mr. Albert has been a member in good standing since he was first admitted to practice law in Pennsylvania in December 2005. Mr. Albert's Pennsylvania bar registration number is 201640. Mr. Albert is admitted to practice before the following Courts:

- a) Commonwealth of Pennsylvania
- b) United States District Court – Eastern District of Pennsylvania

2. Mr. Albert's address, telephone number, facsimile number, and e-mail address are as follows:

280 King of Prussia Road  
Radnor, PA 19087  
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Facsimile: (610) 667-7056  
E-Mail: dalbert@ktmc.com

3. Mr. Albert has never been disbarred, suspended or otherwise reprimanded by any court, department, bureau, or commission of any State, United States, or of any other jurisdiction.

4. The affidavit of Mr. Albert in support of his Motion for Admission *Pro Hac Vice* is attached hereto as Exhibit A.

5. The *pro hac vice* admission fee is being paid contemporaneously with the filing of the motion.

Plaintiff, therefore, respectfully requests that this Court permit J. Daniel Albert of the law firm Kessler Topaz Meltzer & Check, LLP, to appear on his behalf in this matter *pro hac vice*.

Dated: January 15, 2013

Respectfully submitted,

/s/ Joel Levin

Joel Levin (0010671)

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion for *Pro Hac Vice* of J. Daniel Albert was filed electronically. Notice of this filing will be sent by operation of the Court's Electronic Filing System through which parties may access the filing.

Dated: January 15, 2013

/s/ Joel Levin

Joel Levin (0010671)

*Attorneys for Plaintiffs*